

**UNITED STATES BANKRUPTCOURT, NORTHERN
DISTRICT OF ILLINOIS, EASTERN DIVISION**

RE: LIAQUAT HUSSAIN)	Case No. 15 B 40727
)	
)	Chapter 13
Debtor(s))	Judge: CAROL A. DOYLE

NOTICE OF MOTION

TO: Liaquat Hussain 1051 Ridgeview Dr. Inverness, IL 60010	Sulaiman Law Group LTD via Clerk's ECF noticing procedures
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Please take notice that on the 30th day of April 2019 at 9:15 a.m., I or my designee will appear before the Honorable Judge CAROL A. DOYLE in Courtroom 742, 219 S. Dearborn St., Chicago, Illinois, and present the motion set forth below.

I certify that this office caused a copy of this notice to be delivered to the above listed parties by depositing it in the U.S. Mail at 55 E. Monroe St., Chicago, IL on April 10, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO OBJECT TO DISCHARGE

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to enter an order determining that debtor is not entitled to a discharge, stating as follows:

1. Debtor (s) filed the above- captioned Chapter 13 case on November 30, 2015.
2. The plan was confirmed on February 2, 2016.
3. The debtor filed a previous Chapter 7 case, #13 B 46400 filed on December 2, 2013, discharge issue on October 20, 2015.
4. Pursuant to 11 U.S.C. Section 1328(f), "the court shall not grant a discharge of all debts provided for in the plan or disallowed under section 502, if the debtor received a discharge--
 (1) in a case filed under chapter 7,11, or 12 of this title during the 4-year period preceding the date of the order for relief under this chapter, or
 (2) in a case filed under chapter 13 of this title during the 2-year period preceding the date of such order."

Wherefore Trustee prays that the Court enter an order that the debtor or debtors are not entitled to a discharge.

Respectfully submitted,
/s/ Tom Vaughn

Tom Vaughn
Chapter 13 Trustee
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